

# Exhibit “7”

## DECLARATION OF Jane Doe 3

I, **Jane Doe 3**, declare under criminal penalty under the law of Utah that the foregoing is true and correct:

1. I am over the age of eighteen and competent to testify to the statements herein.
2. Around the time I was eight years old, **Perpetrator** married my mother, <sup>Mother 2</sup>. Shortly after the wedding, we moved to Cottonwood Heights. There, <sup>Perp.</sup> began to sexually assault me and my siblings. This continued until I reached puberty, which was around age 13. When I reached puberty, the sexual assaults not only abruptly stopped, but <sup>Perp.</sup> started to treat me like I didn't exist.
3. The sexual assaults were horrific. Painful, both emotionally and physically. <sup>Perp.</sup> would take me into the upstairs bathroom and sexually assault and rape me. This included fondling, and vaginal and anal rape with his finger. He also vaginally and anally raped me with his penis and other objects, like brush handles.
4. At other times, he would make me perform oral sex on him. He typically wasn't naked, but wearing his temple garments. He would expose himself and make me perform oral sex on him. When he was finished, he would often ejaculate on me. These sexual assaults/rapes happened about twice a week from the time he married my mother until I reached puberty. Attached as Exhibit A is a record of an interview from August of 1995 where I explain these assaults.
5. Most of the abuse took place in the upstairs bathroom. A few times it occurred in my parents' room as well. <sup>Perp.</sup> would make me watch porn movies with him there. I remember them being especially graphic movies, with oversized dildos and object penetration. I was shocked because it appeared the actors were enjoying this. When <sup>Perp.</sup> penetrated me with objects, it hurt so much and was more of a punishment.

6. During this time, my mother had a very time-consuming calling in the Church. I believe she was in the Stake Relief Society Presidency and a homemaking supervisor. I remember her always being gone for Church-related business. When she was home, she slept most of the time. My mother had TMJ and other health related issues. She had several prescriptions for these health-related issues. She would take her pills and sleep. The sexual assaults and rapes occurred when my Mom was either out of the house or sleeping downstairs.

7. Growing up, I assumed that the repeated sexual assaults and rapes were punishment. I always thought I was doing something wrong, and that if I was good enough, the sexual abuse would stop.

8. When I was 12 years old, I told my Bishop, Bishop M., about the sexual assaults and rapes. He appeared shocked and in disbelief. He said he would investigate. Nothing was done. This further certified to me that it was my fault.

9. After my disclosure to Bishop M., the sexual assault/rapes of me and my sister Jane Doe 4 continued. It seemed to get worse. Around this time, my mother became aware of what was going on. She eventually called the police. The police started investigating Perp.

10. In addition to sexually abusing my sister Jane Doe 4, I believe that Perp. sexually abused my half-brothers Justin and John Doe 2 as well. After the police became involved, Perp. and my mom split up. I recall my younger brothers being hysterical whenever they were told that they were going to our paternal grandmother, LS's house. Perp. would make them go there for swimming. After their first few visits to LS's house, I put my foot down and said I wouldn't let the boys go over without me. Perp. backed off shortly thereafter. I didn't think about what had happened there, I just didn't want anything to happen to them. John Doe 2 would also become hysterical if Perp. were ever to change his diaper. This is a distinct memory I have that led me to

believe<sup>Perp.</sup> was touching my younger brothers as well.

Signed on the \_\_20\_\_ day of August, 2018, at \_\_Salt Lake City\_\_\_\_ (city  
or county), \_\_Utah\_\_\_\_ (state).

Jane Doe 3

A large black rectangular redaction box covering the signature of Jane Doe 3.

# Exhibit “A”

to Declaration of  
Jane Doe 3



State of Utah

GARY R. HERBERT  
Governor

SPENCER J. COX  
Lieutenant Governor

Department of Human Services

ANN SILVERBERG WILLIAMSON  
Executive Director

Division of Child and Family Services

DIANE MOORE  
Director

Salt Lake Valley Region

RAY HARRIS  
Director

August 23, 2018

Craig Vernon  
1626 Lincoln Way  
Coeur d'Alene ID 83814

E-mail: CVernon@JVWLaw.net

Dear Mr. Vernon:

Your request for records from the Division of Child and Family Services has been reviewed and completed. I have denied in whole or in part, your request for these records. Please see remarks below for explanation regarding your specific records request.

- X The names, addresses, telephone numbers, and specific information that could identify or lead to the discovery of the identity of the person(s) making the initial report (referent). (UCA §62A-4a-412(3)).
- X Pursuant to Utah Code Ann. § 63G-2-302, the information is classified as private. Such as other persons information.
- [ ] Discussion between the Child and Family Services and their attorney
- [ ] Information withheld due to Federal law restriction on disclosure on substance abuse, Cite to 42 C.F.R. Part 2 Such as other person's drug testing results or evaluations.
- X Pursuant to Utah Code Ann. §63G-2-202 (10), a record contained in the DCFS Management Information System that is found to be unsubstantiated, unsupported, or without merit may not be disclosed to any person except the person who is alleged in the report to be a perpetrator of abuse, neglect, or dependency. CPS 512495

You have the right to appeal the denial of any withheld information. If you choose to do so you will need to send a written statement, within 30 days of receipt of this letter to:

**Chief Administrative Officer, Department of Human Services,  
195 North 1950 West, SLC, Utah 84116**

Your appeal must contain your name, your mailing address, your daytime telephone number and a statement of the relief you seek. If you have any questions, please contact me at 801-253-5747 or slgrama@utah.gov

Sincerely,

*Sue Smith*

Sue Smith  
GRAMA Specialist  
Salt Lake Valley Region, Auditor

29 AUG	0920	<p>Both listed victims were brought to CJC by their mother. Mother was present as support for the girls, however, did not actually sit in on the interviews with them.</p> <p>Jane Doe 3 was interviewed first. She disclosed being sexually abused by her step-father, <sup>Perp.</sup> She stated the first time she was abused by him was when she was 7 years old and that the last time was in the 5th grade when she was about 10. She stated that he would touch her "butt" with his finger, tongue, and penis. She stated that there was digital penetration to the vagina. Jane Doe 3 was having a very difficult time talking about the abuse. She appeared embarrassed and stated that she felt like she was to blame. She stated that he would always take her into the bathroom and tell her she was being punished for being bad. At the same time he was sexually abusing her, he would spank or hit her across the head for additional punishment. As the interview went on she disclosed more types of abuse. She stated that he put his penis in her "butt" - "more than once". She stated that he did penetrate her both annaly and vaginally with his penis. She stated that he would also set her on the toilet and then masturbated until he ejaculated on her. She stated that it happened "a lot". It was always for punishment. He would get her out of her room at night when her mom was gone to relief society or another church meeting. She states that she thinks he has done this to her sister and brothers. She states that one time he took her sister out of the room they shared. She states he has been physically abusive to brothers. They come back afraid after visits with him. She and her sister do not have visits with their step-father. She states SF blamed the parents divorce on her and she is accepting the blame. The parents were already in the process of a divorce when she told her mom about the sexual abuse. She didn't feel like her mom believed her at first, but now feels that her mom believes and is protecting.</p>
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